

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re NAMASTE TECHNOLOGIES INC.
SECURITIES LITIGATION

} Case No. 1:18-CV-10830-GHW
}
}
}
}
}
}
}
}

CLASS ACTION

**SECOND AMENDED NOTICE OF PLAINTIFFS' UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Please take notice that lead plaintiffs Janita Holgate, Linda M. Rich and Minako Caddeo (collectively, "Lead Plaintiffs") and plaintiff Willard Workman (together with Lead Plaintiffs, the "Plaintiffs"), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable Gregory H. Woods Courtroom 12C, United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007 for an order: (i) granting Preliminary Approval of the Proposed Settlement; (ii) granting conditional certification of the Settlement Class, certifying Lead Plaintiffs as class representatives, and appointing Lead Counsel as class counsel for purposes of the Settlement; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iv) setting a date for a Settlement Hearing and deadlines for the mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs' motion for final approval of the Settlement, and the filing of Lead Counsel's application for attorneys' fees and expenses.

This motion is based upon the accompanying Memorandum of Law, the Declaration of Jeremy A. Lieberman and the exhibits thereto (“Lieberman Declaration”), both filed simultaneously herewith, and other such matters and argument as the Court may consider at the hearing on this motion. The Defendants, as defined in the Stipulation and Agreement of Settlement (Exhibit 1 to the Lieberman Declaration), do not oppose this motion.

Dated: October 25, 2020

POMERANTZ LLP

By: /s/ Jeremy A. Lieberman
Jeremy A. Lieberman
Brenda Szydlo
Veronica V. Montenegro
600 Third Avenue, 20th Floor
New York, New York 10016
Telephone: (212) 661-1100
Facsimile: (917) 463-1044
Email: jalieberman@pomlaw.com
bszydlo@pomlaw.com
vvmontenegro@pomlaw.com